

No.

In the Court of Criminal Appeals of Texas

FILED
COURT OF CRIMINAL APPEALS
10/29/2020
DEANA WILLIAMSON, CLERK

ZENA COLLINS STEPHENS,

Petitioner

v.

THE STATE OF TEXAS

Respondents

**PETITIONER'S FIRST UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE PETITION FOR REVIEW**

TO THE HONORABLE SUPREME COURT OF TEXAS:

Petitioner files this First Unopposed Motion for Extension of Time to File Petition for Review under Tex. R. App. P. 10.1, 10.5(b), and 53.7(f). In support of this motion, Petitioner shows the following:

1. The Court of Appeals for the First district in Houston rendered its opinion and judgment in *State of Texas v. Zena Collins Stephens*, Case Number 01-19-00209-CR and *Ex parte Zena Collins Stephens*, Case No. 01-19-00243-CR, on October 6, 2020. The petition for review is due no later than November 5, 2020.

2. Petitioner requests an extension of time of thirty days, to December 4, 2020. This is Petitioner's first request for an extension of time in this case.

3. This extension is not sought for delay, but rather to accommodate the schedule of Petitioner's counsel, Chad W. Dunn. Mr. Dunn is involved in many election matters with court deadlines and needs additional time to prepare and file the petition for review.

4. The issues presented in this case are complex and involve important questions of separation of powers, prosecutorial authority, jurisdiction and venue, including constitutional questions.

5. The undersigned has conferred with opposing counsel, who indicated there was no opposition to this request.

6. For the reasons stated above, Petitioner respectfully requests that this Court grant a 30-day extension of time to file her petition for discretionary review to December 4, 2020.

October 27, 2020

Respectfully submitted,

/s/ Chad W. Dunn

Chad W. Dunn

State Bar No. 24036507

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Counsel for Defendant Zena Collins Stephens

CERTIFICATE OF CONFERENCE

As required by Tex. R. App. P. 10.1(a)(5), I certify that on October 27, 2020, I communicated via e-mail with Beth Klusmann, counsel for the State of Texas, and she is unopposed to this motion.

/s/Chad W. Dunn
Chad W. Dunn

CERTIFICATE OF SERVICE

I certify that on October 27, 2020, this document was served electronically on Beth Klusmann, lead counsel for the State of Texas, via beth.klusmann@oag.texas.gov.

/s/ Chad W. Dunn
Chad W. Dunn